

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 24, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees write to address the Court's inquiry at ECF Nos. 6909 and 7012. After surveying counsel for the plaintiffs in the cases identified in Lists A and B and the Appendix included with the Court's order at ECF No. 7012, the PECs have identified only one area from the Court's Order that Plaintiffs contend is not duplicative and as to which Plaintiffs respectfully request that the Court not terminate the MDL caption entries.

Plaintiffs do not object to the Court's proposal to combine entries that identify the same defendant – for example “The Republic of Sudan” and “Republic of Sudan.” However, as to certain of the Sudanese defendants in List A.1., the Court should not terminate the MDL caption entries for defendants that have their own legal personalities and that have been separately named as defendants – for example, the “Republic of Sudan Ministry of Defense,” the “Republic of Sudan Ministry of Interior,” and the “Sudanese Intelligence Service” – have their own distinct legal personalities and were named separately. Accordingly, those defendants' should remain distinct on the master ECF.

The PECs have not identified any other objections to the remainder of the proposals in the Court's order at ECF No. 7012.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

The Honorable Sarah Netburn  
September 24, 2021  
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cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF